

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

RICKY MARTINEZ,)	
)	
Plaintiff,)	
)	Case No. 08 C 3113
v.)	Judge Der-Yeghiayan
)	Magistrate Judge Cole
CITY OF CHICAGO)	
)	
Defendant.)	

**DEFENDANT CITY'S UNCONTESTED MOTION FOR AN EXTENSION
OF TIME TO ANSWER OR OTHERWISE PLEAD
IN RESPONSE TO PLAINTIFF'S COMPLAINT**

Defendant City of Chicago, by its attorney Mara S. Georges, Corporation Counsel of the City of Chicago, moves this Court for an extension of time to answer or otherwise plead in response to plaintiff's complaint. In support of this motion, Defendant states:

1. Plaintiff filed this action on or about May 29, 2008, and Defendant was served a copy of the Summons and Complaint on or about July 28, 2008.
2. The undersigned counsel for Defendant was only recently assigned to this case.
3. The undersigned counsel contacted plaintiff's counsel, Kevin Vodak, by telephone on August 11, 2008, to determine whether plaintiff objects to the City's request to extend time. Mr. Vodak stated that he does not object to the City's request to extend time.
4. Therefore, Defendant requests until September 12, 2008, to answer or otherwise plead in response to the complaint.

5. This request is made not to delay the proceedings, but rather to allow the Defendant to investigate and respond properly to the allegations in Plaintiff's complaint.

WHEREFORE, the City respectfully requests this court to enter an order granting an extension to September 12, 2008, to answer or otherwise plead in response to Plaintiff's complaint.

DATED: AUGUST 11, 2008

Respectfully submitted,

MARA S. GEORGES
Corporation Counsel of the City of Chicago

By: /s/ Joan P. Altman
Joan P. Altman
Assistant Corporation Counsel

30 North LaSalle Street, Suite 1020
Chicago, Illinois 60602
(312) 744-2826

CERTIFICATE OF SERVICE

____ I, Joan P. Altman, an attorney, hereby certify that I filed pursuant to Local Rule 5.9, in accordance with the U.S. District Court for the Northern District of Illinois, Eastern Division's General Order of Electronic Case Filing, Defendant's Uncontested Motion for Extension of Time, and thereby served this document on August 11, 2008, to:

Kevin Vodak
attorney@cairchicago.org

By: /s/Joan P. Altman

Joan P. Altman